

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY,
IOWA, *et al.*,

Debtors.

Chapter 11

Case No. 23-00623 (TJC)

Jointly Administered

**MOTION BY THE MASTER TRUSTEE AND THE BONDHOLDER
REPRESENTATIVE FOR ENTRY OF AN ORDER (I) CONTINUING
THE HEARING ON THE MASTER TRUSTEE AND THE
BONDHOLDER REPRESENTATIVE'S MOTION TO COMPEL
COMPLIANCE WITH AUCTION RESULTS AND (II) GRANTING
RELATED RELIEF**

Computershare Trust Company, N.A., as Master Trustee (the "Master Trustee"), and Preston Hollow Community Capital, Inc., as Bondholder Representative (the "Bondholder Representative" and, collectively with the Master Trustee, the "Secured Bondholder Representatives"), hereby move (the "Motion") pursuant to Local Rule of Bankruptcy Practice and Procedure 9006-1 for entry of an order substantially in the form attached hereto as **Exhibit A** granting the relief requested below.

RELIEF REQUESTED

1. The Secured Bondholder Representatives request a continuance of the hearing on the *Secured Bondholder Representatives' Motion to Compel Compliance with Auction Results* (Docket No. 387, the "Motion to Compel").

2. The Secured Bondholder Representatives filed the Motion to Compel on October 19, 2023, seeking an order from the Court compelling the Debtors to proceed with the Sale in accordance with the terms set forth in the Winning Bid and as negotiated at the auction.

3. The hearing on the Motion to Compel (the “Hearing”) is currently scheduled for October 30, 2023. For the reasons stated herein, the Secured Bondholder Representatives request that the Hearing be continued to November 8, 2023.

4. The Secured Bondholder Representatives, the Debtors, and the Official Committee of Unsecured Creditors (“Committee”) continue to discuss this issue and will continue to work together to attempt to narrow the issues before the Court as much as possible.

5. The Secured Bondholder Representatives have conferred with counsel for the Debtors and the Committee and both consent to the continuance of the Hearing to November 8, 2023.

PRIOR REQUEST

6. The Hearing on the Motion to Compel has not been continued previously.

WHEREFORE, the Secured Bondholder Representatives pray that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein, and granting such further relief as the Court deems just and equitable.

Dated: October 27, 2023

WHITFIELD & EDDY, P.L.C.

/s/ Peter J. Chalik

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-and-

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing dated October 27, 2023.

/s/ Peter J. Chalik